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6 Attorneys for Defendants
 7 INTERNATIONAL LOAN & MORTGAGE CO.
 8 and COAST MORTGAGE CORP.

9 IN THE UNITED STATES DISTRICT COURT
 10 THE NORTHERN DISTRICT OF CALIFORNIA

11 DMITRY YANUSHKEVICH,

12 Plaintiff,

13 v.

14 TROPICANA RUSSELL INC., a California
 15 corporation, d/b/a MARINA FOOD;
 16 INTERNATIONAL LOAN & MORTGAGE
 17 CO., a California corporation; COAST
 18 MORTGAGE CORP., a California corporation;
 19 and DOES 1-10, inclusive,

20 Defendants.

Case No. 3:17-cv-05680-JST

**STIPULATION TO ENLARGE TIME
 PURSUANT TO LOCAL RULE 6-2;
 LOCAL RULE 5-1(i)(3)
 CERTIFICATION; DECLARATION IN
 SUPPORT OF LOCAL RULE 6-2;
 PROPOSED ORDER**

Assigned to the Hon. Jon S. Tigar

Action Filed: October 2, 2017

STIPULATION TO ENLARGE TIME PURSUANT TO LOCAL RULE 6-2

Plaintiff Dmitry Yanushkevich (“Plaintiff”) and Defendants International Loan & Mortgage Co. and Coast Mortgage Corp. (“Defendants”) (collectively, the “Parties”), through their respective counsel, hereby stipulate and agree, pursuant to Civil Local Rule 6-2, as follows:

1. WHEREAS, Plaintiff filed the Complaint in this case on October 2, 2017 (Doc. No. 1);
2. WHEREAS, Plaintiff served the Complaint on Defendants on November 21, 2017 (Doc. Nos. 9, 10);
3. WHEREAS, Defendants’ response to Plaintiff’s Complaint was due on December 12, 2017;
4. WHEREAS, on December 7, 2017, Plaintiff’s counsel consented to a requested extension of time so long as it would not alter any other deadlines;
5. WHEREAS, the case was originally assigned to Magistrate Judge Elizabeth D. LaPorte;
6. WHEREAS, Magistrate Judge LaPorte ordered that a joint inspection in this matter take place no later than January 16, 2018 (Doc. No. 3);
7. WHEREAS, Magistrate Judge LaPort ordered that the Parties complete initial disclosures seven days before the joint site inspection (Doc. No. 3);
8. WHEREAS, the case was reassigned on December 29, 2017 to the Honorable Jon S. Tigar, United States District Court Judge (Doc. No. 14);
9. WHEREAS, the Clerk’s Notice issued on December 29, 2017 states that the above-referenced deadlines “remain as previously set” (Doc. No. 15);
10. WHEREAS, due to the loss of work hours given the national holidays taking place in November and December 2017, and in January 2018, an extension of time is necessary to allow Defendants time to respond to the Complaint, and for the Parties to exchange initial disclosures and conduct a joint inspection pursuant to General Order 56; and
11. WHEREAS, pursuant to Local Rule 6-2, the Parties hereby stipulate that

- a. Defendants may have an extension of time, up to and including January 29, 2018, to answer or otherwise respond to the Complaint;
- b. The Parties will conduct a joint inspection pursuant to General Order 56 no later than March 15, 2018; and
- c. The Parties will exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a) and General Order 56 no later than seven days before the joint inspection is scheduled to take place.

IT IS SO STIPULATED.

WHEREFORE, the Parties respectfully request that the Court approve of this Stipulation made pursuant to Local Rule 6-2 and

1. Extend the Defendants' deadline to answer or otherwise respond to the Complaint filed in the above-captioned case to **January 29, 2018**; and
2. Extend the deadline by which the Parties must complete a joint inspection pursuant to General Order 56 to **March 15, 2018**.

DATED: January 11, 2018

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP
JANET GRUMER
C. BEATRICE NUÑEZ-BELLAMY

By: /S/ C. Beatrice Nuñez-Bellamy
C. Beatrice Nuñez-Bellamy

Attorneys for Defendants
INTERNATIONAL LOAN & MORTGAGE
CO. and COAST MORTGAGE CORP.

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IRENE KARBELASHVILI
IRAKLI KARBELASHVILI

By: /S/ Irene Karbelashvili
Irene Karbelashvili

Attorneys for Plaintiff
DMITRY YANUSHKEVICH

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 5-1(i)(3)

I, C. Beatrice Nuñez-Bellamy, hereby certify that pursuant to Local Rule 5-1(i)(3), I have obtained authorization from the above signatories to file the above-referenced document and that they have concurred in the filing's content.

/S/ C. Beatrice Nuñez-Bellamy
C. Beatrice Nuñez-Bellamy

DECLARATION IN SUPPORT OF STIPULATION

I, C. Beatrice Nuñez-Bellamy, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California and am admitted to practice before this Court. I am an associate at the law firm of Davis Wright Tremaine LLP, and counsel of record for Defendants International Loan & Mortgage Co. and Coast Mortgage Corp. ("Defendants"). I submit this declaration pursuant to Local Rule 6-2 in support of the Parties' Stipulation to Enlarge Time Pursuant to Local Rule 6-2 ("Stipulation").

2. Pursuant to Local Rule 6-2, I attest that the facts set forth in the Stipulation are all true and accurate. The relief requested in this Stipulation is necessary due to the loss of work hours given the national holidays taking place in November and December 2017, and January 2018.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Los Angeles, California on this 11th day of January, 2018.

/S/ C. Beatrice Nuñez-Bellamy
C. Beatrice Nuñez-Bellamy

[PROPOSED] ORDER

Pursuant to the Stipulation to Enlarge Time Pursuant to Local Rule 6-2 (Doc. No. __), it is hereby ORDERED:


1. That Defendants International Loan & Mortgage Co. and Coast Mortgage Corp.'s ("Defendants") deadline to answer or otherwise respond to the Complaint filed in the above-captioned case is extended to **January 29, 2018**;

2. That the deadline by which Defendants and Plaintiff Dmitry Yanushkevich ("Plaintiff") must comply with General Order 56 and complete a joint inspection is extended to **March 15, 2018**; and

3. That Defendants and Plaintiff will exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a) and General Order 56 no later than seven days before the date of the joint inspection.

IT IS SO ORDERED.

January 11, 2018


The Honorable Jon S. Tigar
United States District Court Judge